

UNITED STATES DISTRICT COURT
FOR THE COMMONWEALTH OF MASSACHUSETTS

DEBORAH KELLY,

Plaintiff,

v.

PAUL DONNELLY, MICHAEL BYERS, SGT.
KEITH JACKSON, OFFICER JOHN DOE, in
their individual and official capacities, and the
TOWN OF ROCKLAND, MASSACHUSETTS,

Defendants.

DOCKET NO.: 05 10750 RWZ

JOINT STATEMENT

Pursuant to Local Rule 16.1(D), the plaintiff, Deborah Kelly, and the defendants, Paul Donnelly, Michael Byers, Wayne Jackson and Town of Rockland, submit this Joint Statement. This Joint Statement also constitutes the parties' agenda for the conference.

Proposed Discovery Schedule

Pursuant to Local Rule 16.1(D)(1)(b), the parties have considered conducting phased discovery and have determined that it would not be desirable. Accordingly, the parties propose the following pretrial schedule:

- (a) The parties shall exchange initial disclosures by July 20, 2005;
- (b) All interrogatories and document requests will be served so that the responses will be due by October 20, 2005.
- (c) All experts shall be designated by November 22, 2005; and
- (d) All depositions and discovery shall be completed by January 20, 2006.

The parties further propose that they may stipulate to extend any of (b), (c) or (d) above by up to forty-five (45) days without requesting Court approval, provided that such extension does not affect the schedule for dispositive motions set forth below.

1. Proposed Schedule for Dispositive Motions

The parties propose the following schedule and terms concerning dispositive motions.

- (a) Dispositive motions shall be filed by February 24, 2006.
- (b) Oppositions to dispositive motions shall be filed by March 24, 2006.
- (c) Replies to oppositions shall be filed by April 12, 2006. Replies to oppositions to dispositive motions are authorized without further leave of court, provided that such replies shall be no longer than ten (10) pages, double-spaced.
- (d) A final pre-trial conference will be scheduled after the resolution of the dispositive motions.

2. Rule 16.1(D) Certifications


Local Rule 16.1(D)(3) Certifications will be filed at the time of the Scheduling Conference.

3. Trial by Magistrate Judge

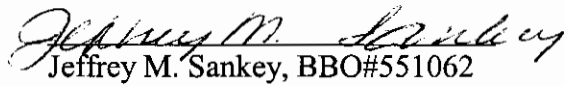
The parties do not consent to trial by magistrate judge.

Respectfully Submitted,

DEBORAH KELLY,
By her attorneys,


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ALL DEFENDANTS
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